NOTICE OF MOTION

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PLEASE TAKE NOTICE that, pursuant to Rules 37(a) of the Federal Rules of Civil Procedure, Plaintiffs will move this Court before the Honorable Gabriel W. Gorenstein, United States Magistrate Judge, at the Daniel Patrick Moynihan United States Courthouse for the Southern District of New York, located at 500 Pearl Street, New York, NY 10007, on a date and time to be determined by the Court, for a decision and order requiring *in camera* review and production with appropriate redactions of documents relating to the NYPD's after-action review of the 2020 Racial Justice protests.

In support of this motion for compel, the Plaintiffs file the attached Memorandum of Law in Support of the Motion to Compel, and the Declaration of Corey Stoughton with supporting exhibits.

PLEASE TAKE FURTHER NOTICE that, pursuant to agreement of the parties and in accordance with the Court's Individual Practices at Rule 2(B), Defendants' opposition is due by July 28, 2022; and Plaintiffs' reply, if any, by August 1, 2022.

Dated: July 21, 2022 New York, N.Y.

/s/ Corey Stoughton

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